

**Remarks**

**Status of Claims**

Claims 1 to 10 have been objected to for wording informalities.

Claims 1 to 7 and 9 have been rejected under 35 USC 112 for indefiniteness.

Claims 1 to 2 and 6 to 10 have been rejected under 35 USC 103(a) for obviousness over Gourrand in view of Itzkovitz.

The Examiner has objected to claims 3 to 5 as being dependent on a rejected base claim, but indicated that such claims would be allowable if rewritten in independent form.

**Claims Objections**

Amendments have been made to the claims essentially in accordance with the Examiner's suggestions save for replacement of "interface(LEM)" by --interface--.

**Rejection under 35 USC 112**

As regards the rejection under 35 USC 112 for indefiniteness, it is respectfully submitted that the term "an Application" is a well-known definite term of art. For example in Newton's Telecom Dictionary, 2004, CMP Books, ISBN Number 1-57820-309-0 the entry for "Application" reads "A software program that carries out some useful task. Database managers, spreadsheets, communication packages, graphics programs and word processors are all applications". A copy of the page from that dictionary including this entry is enclosed. Furthermore, note e.g. the use of the term Application in e.g. Customized Applications for Mobile Enhanced Logic, CAMEL (present patent application page 1 line 13) and Application Programming Interface, API (present patent application page 2 line 11).

**Rejections under 35 USC 103**

**Independent Claims 1, 7, 8 and 10**

We wonder whether the Examiner's rejections of claims 1 to 2 and 6 to 10 may be based on a broad interpretation of the term Wireless Intelligent Network (WIN). Accordingly, independent claims 1, 7, 8 and 10 have all been amended to clarify that WIN is the Wireless Intelligent Network (WIN) standard developed by ANSI-41. In this regard note the reference to WIN on page 1 lines 13 to 15 of the present application mentions ANSI-41, and the definition of WIN provided on enclosed page 917 of Newton's Telecom Dictionary mentioned above, both confirm this.

It follows that in amended independent claims 1, 7, 8 and 10 are not using the term WIN to identify any intelligent networking concept in any wireless network. We are referring here to the wireless intelligent networking (WIN) standard developed by ANSI-41, e.g. for the deployment in CDMA/ANSI-41 networks.

### **Itzkovitz**

The Examiner states in his point 5 that Itzkovitz (US2003165135) discloses a useful summary of IN concepts and standards, by including a reference to Faynberg et al., in "The Development of the Wireless Intelligent Network (WIN) and its Relation to the International Intelligent Network Standards", Bell Labs Technical Journal (Summer, 1997), pp.57-80. A copy of this Faynberg et al. paper can be provided on request. Faynberg defines WIN as part of the ANSI-41 standards suite see e.g. its page 64 paragraph spanning left and right columns. In the section "Conclusion: Toward Mobility and IN Integratiion", on page 78 in the right column lines 16 to 22, Faynberg et. al state: "Although this paper focused only on international IN standards and WIN, it is time now to mention that the Global System for Mobile Communications [GSM] is yet another wireless network standard.) [19] The dissimilarities in standards reflect the differences in regional pre-standard implementations."

It is common industry understanding that the wireless network standard for intelligent networking for GSM networks, is CAMEL, see for example the definition of CAMEL on enclosed page 149 copies from Newton's Telecom Dictionary mentioned above. Therefore, Faynberg here effectively states that CAMEL and WIN are 'dissimilar'. Based on the above, according to the prior art WIN and CAMEL are considered as two incompatible technologies, as explained by Faynberg, and referenced by Itzkovitz. The inventors of the present invention overcame the incompatibility of CAMEL and WIN so as to, for example, find a way of delivering CAMEL services to a CAMEL subscriber roaming in a WIN network. Specifically an interface was provided causing a CAMEL based service to appear to the WIN network as an Application in accordance with the OSA standard. Furthermore, an interface was provided causing a WIN based service to appear to the CAMEL network as a CAMEL application (CAP).

### **Gourrand**

The Examiner, in his point 5, states that Gourrand (2002026473) discloses an interface operative to provide a CAMEL based service to a subscriber terminal in a IN network, causing the CAMEl based service to appear to the IN network as an application in accordance with the OSA standard.

Upon close study of Gourrand (2002026473) the inventors conclude that Gourrand does not disclose the above. Rather, Gourrand discloses an interface in accordance with the OSA standard, and that OSA can be used as a complement to IN-based systems, such as CAMEL.

What the inventors believe is that Gourrand describes in fact, in [0010], [0011], and [0026] is OSA functionality that is at present commonly understood in the industry. That is, Gourrand describes a physical gateway between a third-party domain and public telecommunication network domains. The Gateway would mediate between the APIO interface offered towards the third-party domain, and common network signalling protocols (such as e.g. CAMEL) in the public telecommunications network domain.

**Dependent Claims 2 to 6, 9**

Dependent claims 2 to 6, 9 are patentable not least on the basis that they each depend on an allowable amended independent claim.

**New Claim 11**

New claim 11 is a combination of claims 1 and 3 in accordance with the Examiner's indication of allowable subject matter. Furthermore, in addition to amendments in view of the Examiner's objections, a minor grammatical change has also been made: namely replacement of "in which" by --wherein--.

**New Claim 12**

New claim 12 corresponds to claim 7 subject to some clarifications of wording and limited to include the feature of claim 3 in accordance with the Examiner's indication of allowable subject matter.

**New Claim 13**

New claim 13 corresponds to claim 1 subject to some clarifications of wording limited to include the feature of claim 5 in accordance with the Examiner's indication of allowable subject matter.

**New Claims 14 to 17**

New claims 14 to 17 have been added dependent on claims 1, 7, 8 and 10 respectively. They are patentable not least on the basis that they each depend on an allowable independent claim.

**Conclusion**

In view of the foregoing, allowance of all the claims presently in the application is respectfully requested, as is passage to issuance of the application. If the Examiner should feel that the application is not yet in a condition for allowance and that a telephone interview would be useful, he is invited to contact Applicant's attorney, **Jimmy Goo**, at **908-582-7886**.

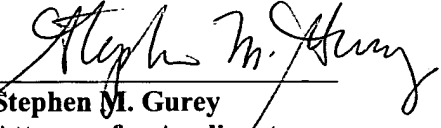
Respectfully submitted,

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Enc:

Front & 2<sup>nd</sup> pages of Newton's Dictionary and  
pages 69, 149 and 917 thereof

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